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Via ECF

Hon. Katharine H. Parker, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Loja et al v. Tabernacle, LLC et al.*
Case No. 25-cv-00038 (JPO)(KHP)

Dear Judge Parker:

We represent Plaintiffs in the above-referenced matter and write to provide the Court with an update on the status of the proposed conditional collective stipulation. The parties have agreed to a stipulation in principle and are continuing to work through the details and disputes as to the terms. Accordingly, we request until May 16, 2025, to submit the finalized proposed stipulation.

Specifically, Defendants object to providing Plaintiffs with the identities of the individuals to whom collective notices will be sent. Plaintiffs believe this objection has no merit, given that Plaintiffs will be distributing the notices, rather than a vendor. As such, Plaintiffs will necessarily need to know the identities of the individuals to ensure proper distribution. The parties are also continuing to discuss the distribution methods, which are based on Defendants' records with employee contact information. Instead of burdening the court with such disputes, the parties will continue work together to finalize a proposed conditional collective stipulation by May 16, 2025.

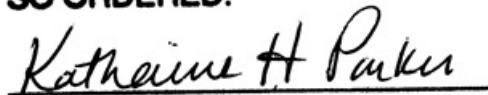
We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

Application granted. The Clerk of the Court is respectfully directed to terminate the motion at ECF No. 23.

SO ORDERED:


HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

05/05/2025